



Phone: (302) 425-6467
Fax: (302) 425-6464
Email: dube@blankrome.com

December 19, 2006

VIA CM/ECF AND HAND DELIVERY

John E. James, Esquire
Potter Anderson & Corroon LLP
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899-0951

**Re: *Magten Asset Management Corp. and Law Debenture Trust Co. v. NorthWestern Corp.*; C.A. No. 04-1494-JJF;
Magten Asset Management Corp. v. Mike J. Hanson and Ernie J. Kindt; C.A. No. 05-0499-JJF; and
Magten Asset Management Corp. v. Paul Hastings Janofsky & Walker, LLP; C.A. No. 04-1256-JJF.**

Dear Special Master:

Magten Asset Management and Law Debenture Trust Company of New York, the plaintiffs in the above-captioned matters, respectfully submit to the Special Master a courtesy copy of their Motion to Compel Discovery from NorthWestern Corporation and defendants Hanson and Kindt. Also enclosed is a copy of a letter sent to Judge Farnan apprising the Court that Plaintiffs believe the Special Master has authority with respect to discovery issues in these cases.

If the Special Master's calendar permits, plaintiffs respectfully request an in-person conference with the Special Master that may facilitate a proper resolution of the issues raised in the Motion to Compel without the need for further briefing.

BLANK

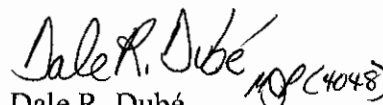


ROME LLP
COUNSELORS AT LAW

John E. James, Esquire
December 19, 2006
Page 2

Should you wish to discuss, counsel is available at your convenience.

Respectfully submitted,


Dale R. Dubé
I.D. No. 2863

DRD/pb
Enclosures

cc: (All cc's sent without enclosures)
Clerk of Court (via CM/ECF and hand delivery)
Bijan Amini, Esquire (via e-mail and Federal Express)
Jesse H. Austin, III, Esquire (via e-mail and Federal Express)
Kimberly A. Beatty, Esquire (via e-mail and Federal Express)
Philip Bentley, Esquire (via e-mail and Federal Express)
John W. Brewer, Esquire
Rebecca L. Butcher, Esquire (via e-mail and hand delivery)
Brenda E. Cooke, Esquire
Victoria W. Counihan, Esquire (via e-mail and hand delivery)
Amanda Darwin, Esquire (via e-mail and Federal Express)
Robert J. Dehney, Esquire (via e-mail and hand delivery)
Nancy E. Delaney, Esquire (via e-mail and Federal Express)
Karol K. Denniston, Esquire (via e-mail and Federal Express)
Bonnie Glantz Fatell, Esquire
Dennis E. Glazer, Esquire (via e-mail and Federal Express)
Miriam K. Harwood, Esquire (via e-mail and Federal Express)
David A. Jenkins, Esquire (via e-mail and hand delivery)
Stanley T. Kaleczyc, Esquire (via e-mail and Federal Express)
Gary L. Kaplan, Esquire
Denise Seastone Kraft, Esquire (via e-mail and hand delivery)
Adam G. Landis, Esquire (via e-mail and hand delivery)
Dennis A. Meloro, Esquire (via e-mail and hand delivery)
Curtis S. Miller, Esquire (via e-mail and hand delivery)
Kathleen M. Miller, Esquire (via e-mail and hand delivery)
Kerri K. Mumford, Esquire (via e-mail and hand delivery)
Jordanna L. Nadritch, Esquire

B L A N K



R O M E ^{LLP}
COUNSELORS AT LAW

John E. James, Esquire
December 19, 2006
Page 3

Mark J. Packel, Esquire
Joanna I. Palacios, Esquire
Joseph D. Pizzurro, Esquire (via e-mail and Federal Express)
Steven J. Reisman, Esquire (via e-mail and Federal Express)
Avery Samet, Esquire (via e-mail and Federal Express)
Bradley F. Silverman, Esquire (via e-mail and Federal Express)
John V. Snellings, Esquire (via e-mail and Federal Express)
Paul Spagnoletti, Esquire (via e-mail and Federal Express)
Bonnie Steingart, Esquire
Matthew J. Williams, Esquire (via e-mail and Federal Express)